

EUSTACE DE SAINT PHALLE, SBN 179100
JOSEPH R. LUCIA, SBN 278318
RAINS LUCIA STERN ST. PHALLE & SILVER, PC
2300 Contra Costa Boulevard, Suite 500
Pleasant Hill, CA 94523
Tel: (925) 609-1699
Fax: (925) 609-1690
E-mail: PersonalInjuryGroup@RLSlawyers.com

ATTORNEYS FOR FIRE VICTIMS

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:
PG&E CORPORATION,
And
PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors

Chapter 11 Case
No. 19-30088 (DM)
Lead Case
(Jointly Administered)

**AFFIDAVIT OF JOSEPH R. LUCIA
EVIDENCING SERVICE OF
SOLICITATION PACKAGES AND
BALLOTS TO FIRE VICTIMS**

I, Joseph R. Lucia, hereby affirm as follows:

On February 27, 2020, my firm (assigned Form Number 205) submitted an executed PG&E Fire Victim Plan Solicitation Directive and Client List excel spreadsheet containing all the names of each fire victim to the Solicitation Agent (Prime Clerk) at PGEBallots@PrimeClerk.com.

In the PG&E Fire Victim Plan Solicitation Directive, our firm selected "Box 4 – Indirect Solicitation Method" which requires the instant Affidavit to be filed with the Court within three business days of delivering solicitation Packages to our clients.

On or about April 15, 2020, we were informed by the Solicitation Agent (Prime Clerk) that the Solicitation Packages were mailed to our office, but that COVID-19 had caused delays in mail arriving in a timely manner. The Solicitation Agent (Prime Clerk) then advised us to notify them no later than April 24, 2020 if we still had not received the Solicitation Packages.

1 On April 24, 2020, we had not received the Solicitation Packages, so the Solicitation Agent
2 (Prime Clerk) in turn, electronically provided us with our clients' respective unique E-Ballot ID Numbers
3 so they could submit their ballots online.

4 On or about April 21, 2020 through April 27, 2020 I caused to be served on each of my clients
5 following documents:

- 6 1. Disclosure Statement for Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of
7 Reorganization;
- 8 2. Supplement to Disclosure Statement for Debtors' and Shareholders Proponents' Join
9 Chapter 11 Plan of Reorganization;
- 10 3. Notice of (I) Approval of Disclosure Statement for Debtors' and Shareholder
11 Proponents' Joint Chapter 11 Plan of Reorganization; (II) Establishment and Approval of
12 Record Date, Voting Deadline, and Other Plan Solicitation and Voting Procedures; (III)
13 Approval of Forms of Ballots, Solicitation Packages, and Related Notices; (IV)
14 Establishment of Plan Confirmation Notice Procedures; and (V) Other Related Relief;
- 15 4. Order (I) Approving Proposed Disclosure Statement for Debtors' and Shareholder
16 Proponents' Joint Chapter 11 Plan of Reorganization; (II) Approving Form and Manner
17 of Notice of Hearing on Proposed Disclosure Statement; (III) Establishing and
18 Approving Plan Solicitation and Voting Procedures; (IV) Approving Forms of Ballots,
19 Solicitation Packages, and Related Notices; and (V) Granting Related Relief;
- 20 5. Fire Victim Claim Plan Treatment Summary; and
- 21 6. Unique E-Ballot ID Numbers for Each Client.

22 On April 28, 2020, the date of this filing, we received for the first time, some clients' Solicitation
23 Packages. Upon review of the Solicitation Packet we were able to confirm that all of the above
24 documents previously provided to our clients were identical to the documents contained in the
25 Solicitation Package. As such, we file this affidavit in an abundance of caution.

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1 By signing this affidavit, I acknowledge that all of the statements contained herein are true and
2 accurate and that the Court may rely on the truth of each of these statements.

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4 **RAINS LUCIA STERN**
ST. PHALLE & SILVER, PC

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6 By: /s/ Joseph R. Lucia
7 Joseph R. Lucia
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